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May 25 1994

94 RF 05925

Jessie M Roberson
Acting Assistant Manager for
Environmental Restoration
DOE/RFFO

SCHEDULE TIES BETWEEN THE FEASIBILITY STUDY (FS) AND THE REMEDIAL INVESTIGATION (RI) REPORTS – SGS 328 94

During the meeting on May 10 1994 between EG&G Rocky Flats Inc (EG&G) the Department of Energy/Rocky Flats Field Office (DOE/RFFO) the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) to discuss schedule impacts of the Stop Work Order an action was taken to resolve the logic ties between the RCRA [Resource Conservation and Recovery Act] Facility Investigation (RFI)/RI Reports and the Corrective Measures Study (CMS)/FS reports

RFI/RI to CMS/FS Logic Tie

The CMS/FS tasks are divided into Phase 1 activities which can be conducted somewhat independently of the RFI/RI Report and Phase 2 activities. The RFI/RI Report and Phase 2 activities depend entirely on the resolution of issues in the RFI/RI investigation and resolution of Phase 1 issues. The Phase 1 activities include identification of alternatives and preliminary remediation goals (PRGs). The Phase 2 activities involve calculation of volumes and detailed analysis of the alternatives.

EG&G recommends that the start of Phase 2 work for the CMS/FS be tied to a comment resolution meeting held with the regulatory agencies at the end of the review period for the draft RFI/RI Reports. At the meeting, if it is determined that the following issues are resolved, the Phase 2 CMS/FS work will proceed.

Contaminants of Concern (COCs) are resolved

Risk levels are determined

Source areas and boundaries are defined

All CMS/FS Phase 1 issues are resolved including Applicable or Relevant and Appropriate Requirements and PRGs

No data gaps are identified requiring an additional RFI/RI investigation

If these issues are not resolved by the comment resolution meeting CMS/FS Phase 2 work cannot proceed. This minimizes the risk of redoing the detailed analysis of alternatives and volume estimates if changes are made to the COCs or source areas.

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This recommendation is different than what is currently in the schedules for Operable Units 2 3 5 and 6 The current schedule ties submittal of the Final RFI/RI Report to the start of the Phase 2 CMS/FS tasks in order to avoid the risk of redoing the Phase 2 work. The new EG&G recommendation manages the risk of redoing Phase 2 work and results in approximately four months of schedule savings

CMS/FS to Proposed Plan Logic Tie

The CMS/FS activities are fied to the Proposed Plan in a similar fashion as above. A comment resolution meeting will be held 21 days after the draft CMS/FS report is submitted to CDH and EPA for review. If signed agreement is reached on the key CMS/FS issues and no changes in direction are identified, work will proceed on the draft Proposed Plan beginning at the end of the review period. This will enable submittal of the draft Proposed Plan approximately two weeks after approval of the Final CMS/FS report and will reduce the current OU 1 schedule by about 30 days.

EG&G is prepared to support this recommendation to the regulatory agencies in detail. If further information is needed please contact John Hopkins at extension 8636. Dennis Schubbe at extension 8709 or Annette Primrose at extension 8618.

S G Stiger

Associate General Manager

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Environmental Restoration Management

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